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10 Attorney for:  
11 CHRISTOPHER WALKER

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13 UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA

15 UNITED STATES OF AMERICA,

16 Plaintiff,  
17 vs.

18 CHRISTOPHER WALKER ,  
19 Defendant.

20 Case No.: 2:14-CR-335-KJD-CWH

21 **STIPULATION TO CONTINUE**  
**MOTION HEARING**  
(First Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
23 States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United  
24 States of America, and Rene L. Valladares, Federal Public Defender, and Brenda Weksler, Assistant  
25 Federal Public Defender, counsel for Christopher Walker, that the motion hearing currently  
26 scheduled for Tuesday, June 9, 2015 at 9:00 a.m. be vacated and set to a date and time convenient  
27 to this court.

28 This Stipulation is entered into for the following reasons:

1. The client is in custody but does not oppose the continuance.  
2. Counsel for the defense is in need of additional investigation.  
3. The additional time requested herein is not sought for purposes of delay, but merely  
to allow counsel for the defendant sufficient time to complete negotiations and necessary research,  
to prepare and submit appropriate pretrial motions.

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1       4. Denial of this request for continuance would deny counsel for the defendant sufficient  
2 time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking  
3 into account the exercise of due diligence.

4       5. Additionally, denial of this request for continuance could result in a miscarriage of  
5 justice. The additional time requested by this Stipulation is excludable in computing the time within  
6 which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States  
7 Code, § 3161(h)(1)(D) and Title 18, United States Code, § 3161(h)(7)(A), considering the factors  
8 under Title 18, United States Code §§ 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

9       6. This is the first stipulation to continue filed herein.

10      DATED: June 8, 2015

12      RENE L. VALLADARES  
13      Federal Public Defender

12      DANIEL G. BOGDEN  
13      United States Attorney

14      By: /s/ Brenda Weksler  
15      BRENDA WEKSLER,  
16      Assistant Federal Public Defender

14      By: /s/ Alexandra Michael  
15      ALEXANDRA MICHAEL,  
16      Assistant United States Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
CHRISTOPHER WALKER ,  
Defendant.

Case No.: 2:14-CR-335-KJD-CWH

## FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The client is in custody but does not oppose the continuance.
2. Counsel for the defense is in need of additional investigation.
3. The additional time requested herein is not sought for purposes of delay, but merely gives counsel for the defendant sufficient time to complete negotiations and necessary research, and submit appropriate pretrial motions.
4. Denial of this request for continuance would deny counsel for the defendant sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking into account the exercise of due diligence.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, § 3161(h)(1)(D) and Title 18, United States Code, § 3161(h)(7)(A), considering the factors in Title 18, United States Code §§ 3161(h)(7)(B) and 3161(h)(7)(B)(iv).
7. This is the First stipulation to continue filed herein.

1 For all of the above-stated reasons, the ends of justice would best be served by a continuance  
2 of the motion and trial dates.

3 **CONCLUSIONS OF LAW**

4 The ends of justice served by granting said continuance outweigh the best interest  
5 of the public and the defendant in a speedy trial, since the failure to grant said continuance would  
6 be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
7 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
8 account the exercise of due diligence.

9 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United  
10 States Code, §§ 3161(h)(1)(A), 3161(h)(7) and Title 18 United States Code, § 3161 (h)(7)(A),  
11 when considering the facts under Title 18, United States Code, §§ 3161(h)(7)(B) and  
12 3161(h)(7)(B)(iv).

13 **ORDER**

14 IT IS THEREFORE ORDERED, that the motion hearing currently scheduled for  
15 Tuesday, June 9, 2015 at 9:00 a.m. , be vacated and continued to July 16, 2015 at the hour  
16 of 1:30 p.m.

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18 DATED: June 11, 2015

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21 UNITED STATES MAGISTRATE JUDGE

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